

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

RICHARD LEE,	)	
	)	
individually, and on behalf of	)	
all others similarly situated,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Civil Action No.
	)	00 Civ. 0984 (DAB)
	)	
ABC CARPET & HOME, JERRY WEINRIB ,	)	
and PAUL CHAPMAN,	)	
	)	
Defendants.	)	
_____	)	

**CORRECTED DECLARATION OF RICHARD T. SEYMOUR IN  
SUPPORT OF PLAINTIFF'S MOTION TO WITHDRAW ADELE  
RAPPORT AS AN ATTORNEY FOR PLAINTIFF**

I make the following declaration subject to the penalties for perjury:

1. I am lead counsel for Plaintiff and the class in this action.
2. Adele Rapport has left my employment, and is now working as an attorney for the Federal government.
3. Ms. Rapport has not been involved in the prosecution of this case for some time.
4. Ms. Rapport has no ongoing responsibilities for any part of this case. Her withdrawal as one of the attorneys for Plaintiff will have no effect on the prosecution of this case or its readiness for trial.

/s/ Richard T. Seymour  
Richard T. Seymour  
Attorney for Plaintiff

Dated: September 9, 2011

**Certificate of Service**

I certify that I have, this 9th day of September, 2011, served a copy of the Corrected Declaration of Richard T. Seymour in Support of Plaintiffs' Motion for Leave to Withdraw Adele Rapport as an Attorney for Plaintiff on counsel of record for defendant, as shown below, by service through the Court's ECF system:

Cliff Fonstein, Esq.  
Joanne Seltzer, Esq.  
Sidley Austin LLP  
787 Seventh Avenue  
New York, NY 10019

/s/ Richard T. Seymour  
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Dated: September 9, 2011